

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth and PBA.

**ORDER GRANTING FOUR HUNDRED FIFTY-NINTH OMNIBUS
OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF
PUERTO RICO AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO
DEFICIENT CLAIMS**

Upon the *Four Hundred Fifty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Public Buildings Authority to Deficient Claims* [ECF No. 20790] (the “Four Hundred Fifty-Ninth Omnibus Objection”)² of the Commonwealth of Puerto Rico (the “Commonwealth”) and the Puerto Rico Public Buildings Authority (“PBA,”

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Fifty-Ninth Omnibus Objection.

and together with the Commonwealth, the “Debtors”), dated May 13, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Fifty-Ninth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Fifty-Ninth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Fifty-Ninth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Deficient Claims” in Exhibit A to the Four Hundred Fifty-Ninth Omnibus Objection (collectively, the “Deficient Claims”) having failed to comply with the applicable rules by not providing a valid basis for the claim, such that the Debtors cannot determine the validity of the claim; and the Court having determined that the relief sought in the Four Hundred Fifty-Ninth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Fifty-Ninth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Fifty-Ninth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Deficient Claims are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to delete the Deficient Claims from the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 20790 in Case No. 17-3283;
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Fifty-Ninth Omnibus Objection

Four Hundred Fifty-Nine Omnibus Objection

Exhibit A - Deficient Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	JENNINGS, SUSAN A 4009 GREENVIEW DR URBANDALE, IA 50322	03/20/2020	19-BK-05523-LTS	Puerto Rico Public Buildings Authority (PBA)	173602	\$565,000.00
	Reason: Proof of claim purports to assert liabilities associated with the Puerto Rico Public Buildings Authority (PBA), but fails to provide sufficient supporting documentation for asserting a claim against the Puerto Rico Public Buildings Authority (PBA), such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					
2	MARCANO VEGA, KENNETH CALLE 17 # S-8 URBANIZACION VERSALLES BAYAMON, PR 00959	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	11963	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					
3	MEDINA VAZQUEZ, RAQUEL URB. GLENVIEW GDNS Q13 CALLE W22A PONCE, PR 00730-1651	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	134531-1	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.					
4	PUERTO RICO HOSPITAL SUPPLY, INC. O'NEILL & GILMORE LAW OFFICE LLC 252 PONCE DE LEON AVE., SUITE 1701 SAN JUAN, PR 00918	05/17/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	16541	\$3,615,277.63
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					

Four Hundred Fifty-Nine Omnibus Objection

Exhibit A - Deficient Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
5	TRAINA, RICHARD AND DONNA M. 936 CONTI STREET APT 9 NEW ORLEANS, LA 70112	09/29/2021	17 BK 03283-LTS	Commonwealth of Puerto Rico	179618	\$10,000.00
Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.						
					TOTAL	\$4,190,277.63*